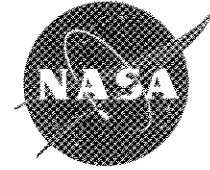


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



July 14, 2010

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at the AIA U.S.
Industry Reception on July 20, 2010

On July 20, 2010, the Aerospace Industries Association (AIA), non-profit organization under 501(c)(6) of the Internal Revenue Code, is hosting a reception at the Ambassador's Residence in London, United Kingdom, at 7:30 p.m. The event provides a forum for the U. S. Representatives from diverse backgrounds to meet and discuss topical aerospace matters.

Approximately 1,000 people have been invited, and to a large number of invitees are expected to attend. The estimated cost of the reception including all food and beverages, is \$85.00 per person. The reception will be attended by representatives of the aerospace industry, state and local officials, the media, the legislative branch, and academia, as well as by employees of other Federal agencies. I find that this reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the reception will allow NASA representatives to discuss NASA's programs and plans with other attendees. Accordingly, NASA employees whose duties do not substantially affect AIA or a majority of all of its members may accept an invitation for free attendance to the reception for themselves and their spouses or guests.

However, NASA employees who are in non-career positions in which Executive Order 13490, requires signing an ethics pledge, may only attend if they reimburse the sponsor the cost of the reception for themselves and accompanying guests. Moreover, NASA employees whose duties do not substantially affect AIA, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. §2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone